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NSY PORTSMOUTH
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LETTER AND MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS REGARDING SEDIMENT EXCAVATION AND STOCKPILE DEWATERING WORK PLAN BUILDING 178 NSY PORTSMOUTH ME
11/9/2012
MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PAUL R. LEPAGE
GOVERNOR

PATRICIA W. AHO
COMMISSIONER

November 9, 2012

Elizabeth Middleton
NAVFAC MIDLANT
Code OPTE3
9742 Maryland Ave
Norfolk, VA 23511

re: Sediment Excavation and Stockpile Dewatering Work Plan, Bldg 178.

Dear Liz,

MEDEP has reviewed the work plan referenced above. The plan was prepared as part of the Shipyard's structural repair of Building 178, and not for the IR program. Therefore, for the most part, we don't expect the IR program to change the Work Plan. As I recently discussed with Matt Thyng, the Navy may address the following comments in a letter separate from the work plan.

1. The one change that should be in the work plan is the correct depth of excavation as discussed during our Oct. 23, 2012 conference call.

2. Please indicate the specific reasons for this work, e.g., it needs to be removed since it obstructs work on the floor (or whatever the reason actually is) and the extent to which it will meet the goals of MS-12 remediation as discussed in the September 2012 draft Proposed Plan for OU4.

3. Please discuss the IR Program's responsibility for any contamination that may be left behind in the sediment removal area as defined in the Work Plan.

4. The depth of sediment between the concrete ramps outside of Building 178 is unknown and during sediment removal it may not be clear how deep to dig. As discussed during our November 6, 2012 site visit, it will be valuable for MEDEP to be on-site at those times to discuss the best course of action with the Navy. Therefore, please be sure to keep MEDEP updated on the work schedule so that we may plan accordingly.

5. 2.0 Preparatory Work. Define AHA

6. 2.0 Preparatory Work. "Water will be allowed to drain through the fabric because the contaminants are located in the sediments and not present in the sea water." This statement may not be accurate since contaminants may readily partition between sediments and water within the

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sediment. However, any contaminants within the water that drains from the dredged sediment are likely at concentrations low enough that upon mixing with river water will be massively diluted so that it does not present an unacceptable risk to surface water biota. Please discuss this issue as we discussed during our Oct. 23, 2012 conference call. This should include any relevant data we have regarding sediment contaminant concentrations within the building, partitioning coefficients, extent of dilution, etc.

Please feel free to contact me at (207) 287-8010 if you have any questions.

Sincerely,

Iver McLeod
Project Manager
Bureau of Remediation and Waste Management

pc:

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